

1. From at least in or about December 2003 through in or about July 2004, in the Southern District of New York and elsewhere, DOUGLAS SHYNE, NATASHA SINGH, a/k/a "Beatrice Rodriguez," CHRISTINE RICHARDSON, and TOYBE BENNETT, a/k/a "Dmitriy Makarevich," a/k/a "Dmitriy Makarevich," a/k/a "Eduardo Rodriguez," a/k/a "Cecilio Pena," the defendants, together with others known and unknown, unlawfully, willfully, and knowingly did combine, conspire, collaborate, and agree together and with each other to commit an offense against the United States, to wit, to violate Title 18, United States Code, Section 1344.

(Bank Fraud Conspiracy)

COUNT ONE

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UNITED STATES OF AMERICA
DOUGLAS SHYNE,
NATASHA SINGH,
CHRISTINE RICHARDSON,
NATHANIEL SHYNE,
TOYBE BENNETT,
a/k/a "Beatrice Rodriguez,"
a/k/a "Dmitriy Makarevich,"
a/k/a "Dmitriy Makarevich,"
a/k/a "Eduardo Rodriguez,"
a/k/a "Cecilio Pena," and
ROBERTO MONTGOMERY,

Defendants.

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

committed the following overt acts, among others, in the Southern "Eduardo Rodriguez," a/k/a "Cecilio Pena," the defendants, a/k/a "Dmitriy Makarevich," a/k/a "Dmitriy Makarevich," a/k/a "Beatris Rodriguez," CHRISTINE RICHARDSON, and TOYBE BENNETT, a/k/a "Legal object thereof, DOUGLAS SHYNE, NATASHA SINGH, a/k/a 3. In furtherance of the conspiracy and to effect the

OVERT ACTS

United States Code, Section 1344.

banks proceeds from a stolen check, in violation of Title 18, among other banks, by depositing into accounts at those Bank), among other banks, by depositing into accounts at those defendants defrauded Citibank and Bank of America (formerly Fleet fraudulent pretenses, representations, and promises, to wit, the and control of, said financial institution, by means of false and securities, and other property owned by, and under the custody corporation, and to obtain monies, funds, credits, assets, which were then insured by the Federal Deposit Insurance authority to defraud a financial institution, the depositors of would and did execute, and attempt to execute, a scheme and others known and unknown, unlawfully, willfully, and knowingly, Rodriguez," a/k/a "Cecilio Pena," the defendants, together with Makarevich," a/k/a "Dmitriy Makarevich," a/k/a "Eduardo CHRISTINE RICHARDSON, and TOYBE BENNETT, a/k/a "Dmitriy DOUGLAS SHYNE, NATASHA SINGH, a/k/a "Beatris Rodriguez," 2. It was a part and an object of the conspiracy that

New York and elsewhere, TOYBE BENNETT, a/k/a "Dmitriy
4. In or about November 2004, in the Southern District of

The Grand Jury further charges:

(Stolen Goods Conspiracy)

COUNT TWO

(Title 18, United States Code, Section 1349.)

DOUGLAS SHYNE.

Douglas NY Five Star Coffee, a business SINGH co-owned with
\$180,000, into the Bank of America (formerly Fleet) account of
RICHARDSON, in the total aggregate amount of approximately
checks drawn from the Citibank account of her mother, CHRISTINE
August 16, 2004, NATASHA SINGH deposited approximately four
d. Between on or about July 28, 2004, and on or about

\$200,000.

Stanley Account, in the total aggregate amount of approximately
Citibank account approximately four checks drawn from the Morgan
August 10, 2004, CHRISTINE RICHARDSON deposited into her own
c. Between on or about July 26, 2004, and on or about
Stanley Account"').

deposited the check into a Morgan Stanley account (the "Morgan
b. On or about March 12, 2004, TOYBE BENNETT
York.
a. In or about March 2004, a check in the amount of
approximately \$775,000 (the "Check") was stolen in New York, New
District of New York and elsewhere:

6. In furtherance of the conspiracy and to effect the illegal object therefore, TOBYE BENNETT, a/k/a "Dmitriy Makarevich," a/k/a "Dmitriy Makarevich," a/k/a "Eduardo

OVERT ACTS

Code, Section 2315.

5. It was a part and an object of the conspiracy that TOBYE BENNETT, a/k/a "Dmitriy Makarevich," a/k/a "Dmitriy Makarevich," a/k/a "Eduardo Rodriguez," a/k/a "Cecilio Pena," and ROBERTO MONTGOMERY, the defendants, and others known and unknown, unlawfully, willfully, and knowingly, would and did receive, possess, conceal, store, barter, sell and dispose of goods, wares, merchandise, securities, and money of the value of \$5,000 and more, which have crossed a state boundary after being stolen, unlawfully converted, and taken, knowing the same to have been stolen, unlawfully converted, and taken, to wit, BENNETT, MONTGOMERY, and others used a counterfeit check to purchase at least approximately three vehicles in Florida, which subsequently were brought to New York, in violation of Title 18, United States

Makarevich," a/k/a "Dmitriy Makarevich," a/k/a "Eduardo Rodrigues," a/k/a "Cecilio Pena," and ROBERTO MONTGOMERY, the defendants, and others known and unknown, unlawfully, willfully, and knowingly did combine, conspire, confederate, and agree together and with each other to commit offenses against the United States, to wit, to violate Title 18, United States Code,

Code, Section 1344.

7. In or about June 2005, in the Southern District of New York and elsewhere, DOUGLAS SHYNE, NATASHA SINGH, a/k/a "Beatrice Rodriguez," CHRISTINE RICHARDSON and NATHANIEL SHYNE, the defendants, together with others known and unknown, unlawfully, aggrieved together and with each other to commit an offense against the United States, to wit, to violate Title 18, United States

The Grand Jury further charges:

(Bank Fraud Conspiracy)

COUNT THREE

(Title 18, United States Code, Section 371.)

YORK, NEW YORK.

vehicles purchased with the countercyclical was brought to New

In or about November 2004, at least one of the c.

Purchased with the counterfeit \$277,000 check.

Picked up one of the vehicles at the Moto Sports that had been

1h or about November 2004, ROBERTO MONTGOMERY

approximately three vehicles.

Motor sports in Fort Lauderdale, Florida for the purchase of

to check in the amount of approximately \$277,000 to Euro

a. In or about November 2004, TOYBE BENNETT sent a

the Southern District of New York and elsewhere:

defendants, committed the following overt acts, in among others, the following overt acts, in

Roadsigns," "a/k/a "Cecilia Pena," and ROBERTO MONTGOMERY, the

b. On or about June 9, 2005, NATHANIEL SHYNE issued

account of NATHANIEL SHYNE, located in New York, New York.

approximately \$180,000 was deposited into the Commerce Bank

a. On or about June 8, 2005, a counterfeited check for

in the Southern District of New York and elsewhere:

the defendants, committed the following overt acts, among others,

“Beatris Rodriguez,” CHRISTINE RICHARDSON and NATHANIEL SHYNE,

illegal object thereof, DOUGLAS SHYNE, NATASHA SINGH, a/k/a

9. In furtherance of the conspiracy and to effect the

OVERT ACTS

18, United States Code, Section 1344.

such checks into accounts at those banks, in violation of Title
other banks, by depositing counterfeit checks and proceeds from
wit, the defendants defrauded Commerce Bank and Citibank, among
false and fraudulent pretenses, representations, and promises, to
custody and control of, said financial institution, by means of
assets, securities, and other property owned by, and under the
Insurance Corporation, and to obtain moneys, funds, credits,
deposits of which were then insured by the Federal Deposit
scheme and artifice to defraud a financial institution, the
and knowingly, would and did execute, and attempt to execute, a
together with others known and unknown, unlawfully, willfully,
CHRISTINE RICHARDSON, and NATHANIEL SHYNE, the defendants,
DOUGLAS SHYNE, NATASHA SINGH, a/k/a “Beatris Rodriguez,”

8. It was a part and an object of the conspiracy that

owned by, and under the custody and control of, said financial monies, funds, credits, assets, securities, and other property by the Federal Deposit Insurance Corporation, and to obtain a financial institution, the depositors of which were then insured execute, and attempt to execute, a scheme and artifice to defraud unknown, unlawfully, willfully, and knowingly, would and did NATHANIEL SHYNE, the defendants, together with others known and DOUGLAS SHYNE, NATASHA SINGH, a/k/a "Beatrice Rodriguez," and 11. It was a part and an object of the conspiracy that Title 18, United States Code, Section 1344.

commit an offense against the United States, to wit, to violate conspiracy, confederate, and agree together and with each other to unknown, unlawfully, willfully, and knowingly did combine, NATHANIEL SHYNE, the defendants, together with others known and DOUGLAS SHYNE, NATASHA SINGH, a/k/a "Beatrice Rodriguez," and August 2005, in the Southern District of New York and elsewhere, 10. From at least in or about July 2005 through in or about The Grand Jury further charges:

(Bank Fraud Conspiracy)

COUNT FOUR

(Title 18, United States Code, Section 1349.)

RICHARDSON's Citibank account.

approximately \$135,000, which checks were deposited into CHRISTINE RICHARDSON in the total aggregate amount of approximately two checks drawn from his Commerce Bank account to

\$21,550, which were deposited into NATHANIEL SHYNE's Commerce NATHANIEL SHYNE, in the total aggregate amount of approximately three checks drawn from CC-2's Bank of America account to c. In or about August 2005, CC-2 issued approximately total aggregate amount of approximately \$73,500.

business co-owned by NATASHA SINGH and DOUGLAS SHYNE, in the six checks drawn from CC-2's Bank of America account to a b. In or about August 2005, CC-2 issued approximately total aggregate amount of approximately \$153,000.

of America account approximately two counterfeited checks in the named as a defendant herein ("CC-2") deposited into CC-2's Bank a. On or about July 25, 2005, a co-conspirator not District of New York and elsewhere:

committed the following overt acts, among others, in the Southern "Beatris Rodrigues," and NATHANIEL SHYNE, the defendants, illegal object thereof, DOUGLAS SHYNE, NATASHA SINGH, a/k/a 12. In furtherance of the conspiracy and to effect the

OVERT ACTS

Code, Section 1344.

accounts at those banks, in violation of Title 18, United States Bank of America and Commerce Bank, among other banks, by representing, and promises, to wit, the defendants defrauded institution, by means of false and fraudulent pretenses,

and reallleged as if set forth fully herein.

14. The allegations set forth in paragraph 3 are repeated

The Grand Jury further charges:

(Money Laundering Conspiracy)

COUNT SIX

(Title 18, United States Code, Sections 1344 and 2.)

National Bank of Omaha accounts.

the fictitious identity of "Beatrice Rodriguez," drawn on First Omaha, among other banks, by using a credit card and checks under promises, to wit, NATASHA SINGH defrauded First National Bank of by means of false and fraudulent pretenses, representations and and under the custody and control of such financial institution, funds, credits, assets, securities, and other property owned by,

Federal Deposit Insurance Corporation, and to obtain money, elsewhere, NATASHA SINGH, a/k/a "Beatrice Rodriguez," the institution, the depositors of which were then insured by the attempt to execute a scheme and artifice to defraud a financial defendant, unlawfully, willfully, and knowingly, did execute and

November 2004, in the Southern District of New York and

13. From in or about December 2003 through in or about

The Grand Jury further charges:

(Bank Fraud)

COUNT FIVE

(Title 18, United States Code, Section 1349.)

Bank account, located in New York, New York.

to conceal and disguise the nature, the location, the source, the knowing that the transactions were designed in whole and in part proceeds of specified unlawful activity, to wit, bank fraud, conduct such financial transactions, which in fact involved wilfully, and knowingly would and did conduct and attempt to the proceeds of some form of unlawful activity, unlawfully, property involved in certain financial transactions represented and affecting interstate and foreign commerce, knowing that the defendants, and others known and unknown, in an offense involving Makrevich, "a/k/a "Eduardo Rodriguez," a/k/a "Cecilio Pena," the and TOBY BENNETT, a/k/a "Dmitriy Makrevich," a/k/a "Dmitriy NATASHA SINGH, a/k/a "Beatriz Rodriguez," CHRISTINE RICHARDSON, Southern District of New York and elsewhere, DOUGLAS SHYNE, or about December 2003 through in or about August 2005, in the 16. It was a part and an object of the conspiracy that in 1956(a)(1)(B)(i).

other to violate Title 18, United States Code, Section combine, conspire, confederate, and agree together and with each known and unknown, unlawfully, wilfully, and knowingly did Rodriguez, "a/k/a "Cecilio Pena," the defendants, and others "Dmitriy Makrevich," a/k/a "Dmitriy Makrevich," a/k/a "Eduardo Rodriguez," CHRISTINE RICHARDSON, and TOBY BENNETT, a/k/a elsewhere, DOUGLAS SHYNE, NATASHA SINGH, a/k/a "Beatriz about August 2005, in the Southern District of New York and 15. From at least in or about December 2003 through in or

opened by TOYBE BENNETT, was deposited into the CitiBank account of approximately \$87,600, drawn from the Morgan Stanley Account on or about April 26, 2004, a check in the amount

c. On or about August 16, 2004, a business co-owned by NATASHA SINGH and DOUGLAS SHYNE.

(formerly Fleet) account of Douglas NY Five Star Coffee, a CHRISSINE RICHARDSON, were deposited into the Bank of America approximately \$180,000, drawn from the CitiBank account of approximately \$180,000, drawn from the CitiBank account of about August 16, 2004, approximately four checks, totaling

b. From on or about July 28, 2004, through on or

of CHRISSINE RICHARDSON.

opened by TOYBE BENNETT, were deposited into the CitiBank account approximately \$200,000, drawn from the Morgan Stanley Account about August 10, 2004, approximately four checks, totaling about August 10, 2004, approximately four checks, totaling

a. From on or about July 26, 2004, through on or

District of New York and elsewhere:

committed the following overt acts, among others, in the Southern "Beatris Rodriguez," a/k/a "Cecilia Pena," the defendants, "Eduardo Rodriguez," a/k/a "Dmitriy Makarevich," a/k/a "Dmitriy Makarevich," a/k/a "Beatris Rodriguez," CHRISSINE RICHARDSON, and TOYBE BENNETT, illegal object thereof, DOUGLAS SHYNE, NATASHA SINGH, a/k/a 17. In furtherance of the conspiracy and to effect the

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1956(a)(1)(B)(i).

activity, in violation of Title 18, United States Code, Section ownership, and the control of the proceeds of specified unlawful

or about June 2005 through in or about August 2005, in the
21. It was a part and an object of the conspiracy that in
each other to violate Title 18, United States Code, Section
did combine, conspire, confederate, and agree together and with
others known and unknown, unlawfully, willfully, and knowingly
CHRISTINE RICHARDSON, and NATANIEL SHYNE, the defendants, and
DOUGLAS SHYNE, NATASHA SINGH, a/k/a "Beatrice Rodriguez,"
August 2005, in the Southern District of New York and elsewhere,
20. From at least in or about June 2005 through in or about
The Grand Jury further charges:

(Money Laundering Conspiracy)

COUNT SEVEN

(Title 18, United States Code, Section 1956(h).)

and DOUGLAS SHYNE.
Douglas NY Five Star Coffee, a business co-owned by NATASHA SINGH
deposited into the Bank of America (formerly Fleet) account of
approximately \$35,000, drawn from CC-3's Citibank account, was
e. On or about June 2, 2004, a check in the amount of
and DOUGLAS SHYNE.
Douglas NY Five Star Coffee, a business co-owned by NATASHA SINGH
deposited into the Bank of America (formerly Fleet) account of
approximately \$47,230, drawn from CC-3's Citibank account, was
d. On or about May 12, 2004, a check in the amount of
of a co-conspirator not named as a defendant herein ("CC-3").

approximately two checks drawn from his Commerce Bank account to b. On or about June 9, 2005, NATHANIEL SHYNE issued account of NATHANIEL SHYNE, located in New York, New York. approximately \$180,000 was deposited into the Commerce Bank a. On or about June 8, 2005, a counterfeit check for in the Southern District of New York and elsewhere: the defendants, committed the following overt acts, among others, "Beatriz Rodriguez," CHRISTINE RICHARDSON, and NATHANIEL SHYNE, illegal object therefore, DOUGLAS SHYNE, NATASHA SINGH, a/k/a 22. In furtherance of the conspiracy and to effect the

OVERT ACTS

18, United States Code, Section 1956(a)(1)(B)(i). proceeds of specified unlawful activity, in violation of Title location, the source, the ownership, and the control of the in whole and in part to conceal and disguise the nature, the to wit, bank fraud, knowing that the transactions were designed which in fact involved proceeds of specified unlawful activity, did conduct and attempt to conduct such financial transactions, unlawful activity, unlawfully, willfully, and knowingly would and financial transactions represented the proceeds of some form of foreign commerce, knowing that the property involved in certain unknown, in an offense involving and affecting interstate and NATHANIEL SHYNE, the defendants, and others known and NATASHA SINGH, a/k/a "Beatriz Rodriguez," CHRISTINE RICHARDSON, Southern District of New York and elsewhere, DOUGLAS SHYNE,

improvements, fixtures, attachments and easements, located at 708 parcel of land, together with its buildings, appurtenances, fraud offenses, including but not limited to all that lot or from proceeds obtained directly or indirectly as a result of the pursuant to 18 U.S.C. § 982, any property constituting or derived Roadsigns," the defendants, shall forfeit to the United States Indictment, DOUGLAS SHYNE and NATASHA SINGH, a/k/a "Beatrix Offenses alleged in Counts One, Three, Four and Five of this 23. As a result of committing one or more of the foregoing

FORFEITURE ALLEGATION

(Title 18, United States Code, Section 1956(h).)

\$21,550.

NATHANIEL SHYNE, in the total aggregate amount of approximately three checks drawn from CC-2's Bank of America account to e. In or about August 2005, CC-2 issued approximately total aggregate amount of approximately \$73,500. businesses co-owned by NATASHA SINGH and DOUGLAS SHYNE, in the six checks drawn from CC-2's Bank of America account to a d. In or about August 2005, CC-2 issued approximately total aggregate amount of approximately \$153,000.

of America account approximately two counterfeited checks in the named as a defendant herein ("CC-2") deposited into CC-2's Bank c. On or about July 25, 2005, a co-conspirator not approximately \$135,000.

CHRISTINE RICHARDSON, in the total aggregate amount of

United States Attorney

MICHAEL J. GARCIA

Michael J. Garcia

FOR PERSON

Mike Clark

(Title 18, United States Code, Sections 982 and 1344.)

defendant up to the value of the above forfeitable property.

982(b), to seek forfeiture of any other property of said
it is the intent of the United States, pursuant to 18 U.S.C. §

cannot be subordinated without difficulty:

(e) has been commingled with other property which

(d) has been substantially diminished in value; or

Court:

(c) has been placed beyond the jurisdiction of the

a third person;

(b) has been transferred or sold to, or deposited with,

diligence;

(a) cannot be located upon the exercise of due

result of any act or omission of the defendants:

24. If the above-described forfeitable property, as a

Substitute Assets Provision

Meadow Court, Williamsown, NJ 08094.

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Horegerson.

Mr. Mc Clellan

A TRUE BILL

MICHAEL J. GARCIA
United States Attorney.

(Title 18, United States Code, Sections 2, 371, 1344, 1349, 2315, 1956(a)(1)(B)(i), 1956(h).)

SI 05 Cr. 1067 (KMk)

SUPERSEDEDING INDICIMENT

Defendants.

DOUGLAS SHVANE, NATASHA SINGH,
/a/k/a, "Beatris Rodriguez", CHRISTINE
RICHARDSON, NATHANIEL SHVANE,
TOYBE BENNETT, /a/k/a, "Dmitriy Makarevich",
/a/k/a, "Dmitriy Makarevich",
Rodrigues", /a/k/a, "Cecilio Pema", and
ROBERTO MONTGOMERY,

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UNITED STATES OF AMERICA

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK